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FILED VIA ECF

Hon. P. Kevin Castel
United States District Judge
United States Courthouse
Southern District of New York
500 Pearl Street
New York, New York 10007

January 17, 2021

United States v. Mauricio HERNANDEZ-PINEDA
15 Cr. 379 (PKC)

Dear Judge Castel:

As the Court no doubt recalls, I am counsel of record for Mr. Hernandez-Pineda in this matter, which is currently scheduled for a status conference on Tuesday morning, January 19, 2021 at 10:30am. The conference is due to proceed by teleconference due to the ongoing COVID-19 pandemic.

I write to request an adjournment, to which the government consents. The basis for the application is that I was notified last evening that I am now scheduled to receive my first vaccination against the virus at 10:30am on Tuesday morning. In light of the widespread news reports of the extraordinary difficulty in obtaining an appointment to be vaccinated, I must ask that the Court grant my request. I apologize, obviously, for the lateness of this request, particularly over a Holiday weekend, and hope that the Court can understand.

I am aware that a considerable amount of time has elapsed since my client last appeared before the Court. I can, however, advise the Court I maintain close contact with him and that the parties continue to engage actively in plea negotiations. Accordingly, we understand that the Court may want to hear further from the parties at a conference, but I ask that the Court also consider giving us another thirty to forty-five days to allow those discussions to continue.

Regardless of whether the Court sees fit to grant a short or lengthier adjournment under the circumstances, we consent to an exclusion under the Speedy Trial clock, and we thank the Court for its kind consideration of this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "H. Leader".

HOWARD LEADER

cc: Matthew J. Laroche, Esq.
Jason A. Richman, Esq.
Elinor Tarlow, Esq.
Amanda L. Houle, Esq.
Jacob H. Gutwillig, Esq. (VIA ECF)